



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2020

Rebecca M. Horton
Lilly Miller Brands
1000 Parkwood Circle, Suite 700
Atlanta, GA 30339

Subject: Addition of PF10 respirator to strychnine labels as required by the EPA letter dated July 19, 2019
Product Name: Cooke Quick Action Gopher Mix
EPA Registration Number: 909-2
Application Date: 08/26/2019
Decision Number: 554593

Dear Ms. Horton:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. You are permitted to sell or distribute products under the previously approved labeling for a period of 18 months from the date of this amendment. After this 18-month period, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2
EPA Reg. No. 909-2
Decision No. 554593

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at Shrestha.srijana@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

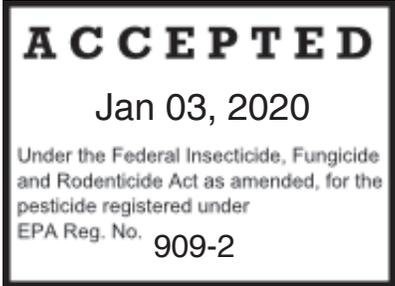
Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

{NOTE TO REVIEWER [] Indicates alternate or optional wording. {} Indicates notes to Reviewer that will not appear on the final label}

COOKE QUICK ACTION GOPHER MIX

FOR CONTROL OF POCKET GOPHERS
READY-TO-USE
POISON GRAINS



ACTIVE INGREDIENT:
Strychnine alkaloid 0.50%
INERT INGREDIENTS 99.50%

Keep out of reach of children

POISON [SKULL AND CROSSBONES]
DANGER

FIRST AID

IF SWALLOWED: CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY. If less than ten (10) minutes have passed since the poison was taken, give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Have patient lie down in a quiet, darkened room and keep him warm and quiet. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

NOTE TO PHYSICIAN

Administer 100% Oxygen by positive pressure to provide as much pulmonary gas exchange as possible, despite seizures. Administer ANTICONVULSANT DRUGS intravenously to control convulsions.

NOTICE: It may be difficult or impossible to stop the seizure activity without stopping respiration. Be prepared to maintain pulmonary ventilation mechanically. Tracheotomy may be necessary if seizures are prolonged.

See [back] [side] panel for additional precautionary statements.

NET WT. _____

{Back/Side Panel(s)}

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Convulsive Poison! Fatal if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not breathe dust. Do not apply this product in a way that will contact any person or pet. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE) {Pkg. \leq 5LB}

Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- cotton gloves
- shoes plus socks
- NIOSH-approved particulate filtering facepiece respirator with any R, or P; OR a NIOSH-approved elastomeric particulate respirator with any R, or P filter; OR a NIOSH-approved powered air-purifying respirator with a HE filter.

Keep and wash PPE separately from other laundry.

PERSONAL PROTECTIVE EQUIPMENT (PPE) {Pkg. $>$ 5LB}

Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- cotton gloves
- shoes plus socks
- NIOSH-approved particulate filtering facepiece respirator with any R, or P; OR a NIOSH-approved elastomeric particulate respirator with any R, or P filter; OR a NIOSH-approved powered air-purifying respirator with a HE filter.

Follow manufacturer's instructions for cleaning and maintaining PPE. If there are no such instructions, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not allow bait to be exposed on soil surface. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply directly to food or feed crops. Do not contaminate water when disposing of equipment washwaters.

ENDANGERED SPECIES CONSIDERATIONS

NOTICE: The killing of a member of an endangered species during strychnine baiting operations may result in a fine under the Endangered Species Act. Before baiting, the user is advised to contact the Regional U.S. Fish and Wildlife Service (Endangered Species Specialist) or the local Fish and Game Office for specific information on endangered species. Strychnine baits should not be used in the geographic ranges of the following species except under programs and procedures approved by the U.S. EPA: San Joaquin kit fox, Morro Bay kangaroo rat, salt marsh harvest mouse, gray wolf and grizzly bear.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For home use only.

USE RESTRICTIONS

This product may only be used to control pocket gophers (Geomys spp. and Thomomys spp.) in underground applications in outdoor residential areas, including lawns. Bait must be manually applied directly into pocket gophers' underground burrow systems. Do not apply this product by use of a mechanical burrow builder. Do not apply this bait on or above the ground surface. Immediately pick up any bait that spills on the ground. Keep pets and other people out of the area during application.

BAITING

Burrowing pocket gophers throw out low, fan shaped mounds on either side of their underground tunnel. These lateral tunnels coming to the surface are on the flat side of the fan and are plugged with soil. Remove burrow plug from the flat side of the burrow fan. Use long-handled spoon and insert 1 teaspoon of bait into main runway system. Close tunnel with soil. Do not permit soil to cover bait. Depending upon pocket gopher population levels, one-quarter (1/4) cup applied by hand will treat 4500 to 35000 square feet.

STORAGE AND DISPOSAL {Pkg. < 10 LB}

Pesticide Storage: Store only in original container, in a dry place inaccessible to children, pets, and domestic animals.

Pesticide Disposal: Recover any spilled product, securely wrap it in several layers of newspaper, and discard in trash. **If partially filled:** Call your local solid waste agency for disposal instructions. Do not pour any unused product down any indoor or outdoor drain.

Container Disposal: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or, discard container in trash.

STORAGE AND DISPOSAL {Pkg. ≥ 10 LB}

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store only in original labeled container in a cool, dry area inaccessible to children, pets, and domestic animals.

Pesticide Disposal: If partially filled: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spilled bait, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: If empty: Nonrefillable container. Do not reuse or refill this container. Triple-rinse container. Then puncture container and offer it for recycling, if available, or disposal in a sanitary landfill. If allowed by State and local authorities, container may be disposed of by burning. If container is burned, stay out of smoke.

Filled by weight not by volume. Product may settle after packaging.

NOTICE: Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, Seller's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

{Lot no. to be added at production}

LILLY MILLER BRANDS
1000 Parkwood Circle, Suite 700
Atlanta, GA 30339

www.lillymiller.com

0 81817 46395 0